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EVALUATION REPORT ON WATER POLLUTION CONTROL PROGRAM PLAN FOR THE STATE OF NEBRASKA DEPARTMENT OF HEALTH WATER POLLUTION CONTROL COUNCIL, FY 1971

FEDERAL WATER POLLUTION CONTROL ADMINISTRATION,
KANSAS CITY, MISSOURI

SEPTEMBER 1970

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FOR THE STATE OF NEBRASKA
DEPARTMENT OF HEALTH
WATER POLLUTION CONTROL COUNCIL

FY 1971

Sept. 1970

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SPRINGFIELD, VA. 22161

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WATER POLLUTION CONTROL PROGRAM PLAN
FOR THE STATE OF NEBRASKA
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WATER POLLUTION CONTROL COUNCIL
FY 1971

U. S. Department of the Interior
Federal Water Quality Administration
Missouri Basin Region, Planning and Program Grants
Kansas City, Missouri September 1970

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Evaluation rating. <—

SUMMARY OF NEBRASKA

FISCAL YEAR 1971 PROGRAM PLAN

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. STATUS OF INTERSTATE AND INTRASTATE WATER QUALITY STANDARDS:

Nebraska's Water Quality Standards and nondegradation statement were approved by the Secretary of the Interior on December 19, 1968. The FWQA has made several recommended changes to strengthen the Standards including a secondary treatment date of December 31, 1975, for facilities on the main stem of the Missouri River. The State has failed to take action on these changes, although hearings have been held. (See Section 3.1) October 9 is the estimated date for approval of the recommended changes.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Develop an implementation and enforcement plan for industrial wastes.
Locate and determine effects of agricultural wastes upon surface waters.
Increase the number of parameters used to evaluate stream quality.
Expand a study of waste water treatment plant efficiency and determine effects of the effluent upon receiving streams.
All water quality data collected by the Water Pollution Control Agency will be entered into the FWQA STORET system.
One hundred percent, semi-annual plant inspection goal.
Enact and fund a 25 percent State matching grant law for construction of waste treatment facilities.

(continued on next page)

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES:

The staffing level proposed for FY 1971 is an increase of one position or an increase of 8 percent over last year. The proposed budget reflects 12.5 percent increase over FY 1970 expenditures. All elements of their program reflects some increase in budget, yet proposed efforts for this year are very inadequate in all elements. The projected budget for FY 1972 of $273,590 with a 21-man staff comes close to being the minimum effort needed to do the job. The organization would improve if a planning and special studies section were created in order to meet new planning requirements. There appears to be some problems in the State's accounting and records system; however, the extent or seriousness of the problem will not be

(continued on next page)

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

a. Amend the Water Quality Standards to reflect those changes recommended by FWQA.
b. Double the existing budget and staff.
c. Adopt and fund a State matching grant program.
d. Implement an effective permit and reporting system.
e. Enact a mandatory operator certification law.
f. Thorough enforcement of municipal and industrial compliance schedule.
g. Increased surveillance in order to determine violations and compliance with Water Quality Standards.
h. Expand the operator training program.
i. Wider diversification of staff expertise to include natural resource management and/or planning.

SUMMARY (continued)

2. (continued)

Expand waste treatment plant operator training program and seek the establishment of a CAMPS Training Program.
Update industrial waste survey.
Initiate special water quality studies.
Continue to provide input into State Water Plan.

3. (continued)

known until the Department of the Interior's audit findings are made available. The proposed Bill for State matching grants for construction of waste treatment facilities could provide added incentive in constructing needed facilities if it is adopted and funded. Mandatory certification of waste treatment plant operators is also needed.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

a. Slight increase in budget and staff.
b. Semi-annual inspection of all municipal treatment plants.
c. Continuing treatment plant operator training program though the number of operators participating is not known.
d. Provided water quality data to STORET.
e. Acquired mobile laboratory and monitoring equipment.
f. Completion of some industrial and municipal treatment facilities.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.1 Water Quality Standards and Compliance

EVALUATION RATING: [illegible] POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The Nebraska Water Quality Standards and nondegradation statement were approved by the Secretary of the Interior on December 19, 1968. The FWQA has since suggested that certain changes be made to the Standards. The changes were tentatively agreed to by the State; however, they have yet to take positive action on these recommendations and until the Standards have been amended, this section must be considered poor.

(continued on next page)

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Develop an implementation and enforcement plan for industrial wastes.
Evaluate the quality of surface water by using more sophisticated parameters such as biological indicators and pesticides.
Locate major sources of agricultural wastes and evaluate their effect upon surface waters.
Develop guidelines and regulations for controlling wastes from sand and gravel extractions and marinas.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Approximately 50 percent of the manpower (6 man-years) and budget is allotted to the Pollution Control Surveillance and Enforcement Element. Percentage-wise this effort is more than adequate, but it is deficient in terms of money expended and actual man-years of effort. A minimum of 10 man-years of effort per year is necessary to maintain an adequate surveillance and enforcement program.

Status and organization are not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Inadequate financing resulting in a manpower shortage is a major problem.
Strengthen Water Quality Standards as outlined in item 1 above.
Develop an implementation and enforcement plan for industrial wastes.
Locate industrial and agricultural waste sources and determine effects on surface water.
Expand laboratory facilities, capabilities, and parameters for evaluating water quality.
The State's approach toward municipal and industrial compliance does not appear to be getting the desired results. A tougher approach with communities and

(continued on next page)

3.1 (continued)

1. (continued)

The recommended changes as outlined in the Regional Director's letter of June 23, 1970, are as follows:

A. Treatment of Wastes Discharged to the Missouri River:

"The Nebraska Water Pollution Control Council will require each municipality, community, and industry discharging waste waters into the Missouri River to enter into contract as soon as possible for studies, preparation of plans and specifications, compacts and agreements, and other details necessary for the construction of or the improvement of waste water treatment works so as to provide no less than secondary treatment and disinfection by December 31, 1975."

B. Temperature Criteria for the Missouri River: The Nebraska Standards now state, "For Missouri River from Gavins Point Dam to Sioux City, Iowa--Maximum temp 85°F. Allowable Change 4°F." This should be changed to more nearly reflect actual conditions and to be more compatible with South Dakota criteria. The area covered should be from the South Dakota State line near Fort Randall Dam to Sioux City, Iowa.

The following temperature criteria is suggested:

"South Dakota-Nebraska State line near Fort Randall Dam to Sioux City, Iowa: Maximum temp 80°F - Allowable Change 4°F."

C. Temperature Criteria for Lakes and Reservoirs: Lakes and reservoirs require more stringent criteria than streams. We suggest the following temperature criteria for all interstate lakes and reservoirs:

"The temperature of the epilimnion shall not be raised more than 3°F above that which existed before the addition of heat of artificial origin. Unless a special study shows that the discharge of a heated effluent into the hypolimnion will be desirable, such practice is not recommended and water for cooling shall not be pumped from the hypolimnion to be discharged to the same body of water."

D. Temperature Criteria for Class "C" Warm Water Streams (except the Missouri River): The present Standards now designate a greater temperature change (10°F) during November through April.

(continued on next page)

3.1 (continued)

1. (continued)

For all warm water streams, we suggest the following:

Allowable change $5^{\circ}F$.
Maximum limit $90^{\circ}F$.
Maximum rate of change limited to 2° per hour.

E. Residue, Oil, and Floating Substances: We suggest that a statement be added to limit the emulsified oil and grease:

"Emulsified oil and grease shall be less than 10 mg/l."

F. Classification of Platte River: The City of Omaha obtains water from wells screened in the alluvial deposits of the Platte River. Much of the water produced is induced infiltration of the surface water flows. Thus, we recommend that a Class "A" use be assigned to this stream in order to protect this domestic water supply use.

G. Plan of Implementation and Enforcement, page 13, paragraph 2: We suggest this paragraph be modified by including a statement which specifies the date when such a plan will be submitted to the Secretary of the Interior.

H. Date for Compliance, page 16, and Statement of Authority, Objective and Policy, page ii: We suggest that these sections be updated to include statements which specify the date when the special timetable for facilities discharging to the Missouri River will be developed and submitted to the Secretary of the Interior.

I. Appendix III, starting on page 22 of the Standards: We suggest that the Appendix be updated to show treatment completed and the additional treatment requirements for wastes discharged to the Missouri River. Note "a" at the end of the Appendix should also include the requirements for wastes discharged to the Missouri River.

Other changes as outlined in the letter dated September 4, 1970, from the Director, Division of Water Quality Standards, Office of Enforcement and Standards Compliance.

4. (continued)

industries may be necessary to meet the 1972 compliance schedule.

Develop guidelines and regulations for controlling wastes from sand and gravel extractions and marinas.

5. ADDITIONAL COMMENTS:

With regard to questions raised on various numerical water quality criteria identified in questions 1.3.4 and 3.1.3, FWQA with assistance from many other scientific organizations has, we believe, established and justified present standards.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

A number of communities and industries have completed corrective action and several have taken some steps toward correcting violations.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.2 Water Quality Monitoring

EVALUATION RATING: ~~XXXXXXXXXX~~ ADEQUATE MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

There are no significant changes in the State's monitoring program. The surveillance program utilizes the monitoring efforts of the State, USGS, and FWQA. The State indicates 28 stations are monitored by them on a monthly basis. Sampling program and procedures are adequate.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

The laboratory is obtaining a COD analyzer and will run fecal coliform analysis. Two automatic water quality monitors will be placed in operation this plan year. All water quality data collected by the Pollution Control Agency will be entered into the FWQA STORET system.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Organization and statutes appear adequate. Staffing is not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

a. Increase staff, including a bacteriologist and aquatic biologist.
b. Expand monitoring program to include areas of lower water quality that are in violation of interstate water quality standards or State orders. This effort should complement existing network of monthly stations.
c. Continue to supply water quality data to the STORET system.
d. Continue study on irrigation return water.

5. ADDITIONAL COMMENTS:

The Omaha-Council Bluffs Metropolitan Area Planning Agency has completed the first year of a 3-year water quality management project with the assistance of an FWQA 3(c) grant. This project includes 31 water quality monitoring stations throughout the metropolitan area with sampling frequency on a monthly and quarterly basis. Water quality data will be included in the STORET system.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Data from the State's water quality monitoring program has been entered into STORET.

Two automatic monitors have been obtained and will be placed in operation this plan year.

Twenty-eight stations monitored monthly by the State, and 217 stations monitored quarterly.

While not mentioned in the Plan, the State does report that a mobile laboratory was purchased last year and should be placed in operation this year.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.3 Effluent Controls

EVALUATION RATING: ~~GOOD ADEQUATE INADEQUATE~~ POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Nebraska does not use effluent standards or permit system for controlling discharges (see also Item 5). Plant operating reports are not required from treatment plants; however, the Water Quality Standards indicate that such a program is to be developed for "significant" municipal and industrial plants.

This element is very poor.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvements listed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Budget, staff, organization, and statutes are not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Develop necessary regulations and legislation to require operating reports from all waste treatment plants. Increase staff and budget so as to implement an effective permit and reporting program and to meet construction grant requirements. The contingency plan is weak. The agency, having pollution control authority, should take the responsibility for developing and implementing the contingency plan activities.

5. ADDITIONAL COMMENTS:

State statutes give the Council the authority to require discharge permits, yet they fail to implement this requirement, a serious weakness in their water pollution control program.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

No accomplishments indicated.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.4 Inspection of Treatment Plants

EVALUATION RATING: ~~GOOD~~ ADEQUATE ~~MARGINALXXXXPOOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Last year, Nebraska inspected semi-annually all municipal facilities, 70 percent of the industrial facilities, and all State facilities. There is no program for validating effluent data supplied by the facility nor does it appear that effluent samples are taken at time of inspection.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

With the exception of a 100 percent inspection goal, no improvements or significant expansions are proposed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

While the inspection level indicated in the Plan is approaching the 100 percent mark, the question must be raised as to how this has been accomplished with such a small staff. Further, how thorough are the inspections, particularly when treatment plant reports are not required nor effluent samples taken.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Increase staff and budget.
Influent and effluent analyses should be done on a routine basis.
Continue the existing frequency-of-inspection schedule. Under the new construction grant regulations, inspection of new municipal projects must be at least annual for the first 3 years after project completion.
Records of plant operations should be kept continuously. The records should include influent and effluent analyses and the reporting of bypasses and other releases.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

All municipal plants, 60 industrial plants, and 20 State facilities were inspected twice in the past year. This represents a 95 percent inspection level.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.5 Certification of Waste Treatment Plant Operators

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ ~~MARGINAL~~ POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

Certification of operators is a voluntary process through a program operated by the Nebraska Water Pollution Control Association. The State Department of Health does not officially recognize this program. The State Department of Health is represented on the Certification Committee and its representative is the Secretary of the Committee. The voluntary program has resulted in a low level of certification for municipal plant operators and no certification for industries or State operators. To date, only 22 percent of all plant operators have been certified.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvement proposed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Statutes will remain deficient until a mandatory certification law is enacted. Based on the low level of certification; staff, budget, and organization are not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Enact a mandatory certification law.
Until mandatory certification is required, the State should increase its activities in the voluntary certification program and officially recognize the existing program.
The State should seek assistance under the CAMPS program to provide impetus to the voluntary system.
There is a discrepancy in the total number of municipal operators as reported in last year's and this year's plans. Efforts should be made to inventory the number and class of treatment plant operators in Nebraska.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Twenty-one operators certified.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 3 POLLUTION CONTROL SURVEILLANCE AND ENFORCEMENT

PLAN SECTION: 3.6 Enforcement and Regulations

EVALUATION RATING: GOOD~~XXXXADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The Nebraska Water Pollution Control Council has adequate authority to enforce their water pollution control statutes. Only one formal enforcement action has been taken recently with positive results. The State's policy has been one of persuasion rather than formal action. While the State appears to have some degree of success in this manner, stronger enforcement action is needed to assure compliance on a timely basis.

(continued on next page)

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvement or expansion listed. It is known that the feedlot regulations adopted in 1968 are being implemented.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Staff and budget require expansion to carry out the needed enforcement program. It appears that the Council has corrected the problem mentioned in last year's evaluation by having established procedures to hold enforcement hearings. The Council needs to take steps necessary to exercise authority to control non-point discharges. Areas such as sedimentation, pesticides, highway construction, dredging and filling, etc., are not adequately defined nor does the Council have control over these sources.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Evaluate pollution resulting from sources mentioned in Item 3 above to determine existing problems and develop and enforce control measures.
Increase staff.
The Council should have review and approval authority for all comprehensive plans having environmental considerations. This authority should be established by statutes and regulations.

3.6 (continued)

1. (continued)

Two cities, Dakota City and Omaha, were under Federal enforcement action. Dakota City completed necessary facilities some time ago. Omaha's primary treatment facilities went into operation in the fall of 1969. The FWQA is asking for secondary and disinfection by December 31, 1975.

5. ADDITIONAL COMMENTS:

The agency does not supply input into the State Comprehensive Plan. This needs to be corrected as outlined in Item 4 above.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

One municipality and one industry under enforcement orders have completed required facilities.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.1 Review of Plans and Specifications

EVALUATION RATING: GOODX ADEQUATE ~~MEDIOCREXXXXPOOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

This section is essentially unchanged from previous submission. An estimated 45 sets of plans will be reviewed this year. All proposed treatment facilities must provide at least secondary treatment with the exception of those discharging into the Missouri River. Review procedures and requirements appear adequate.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvements proposed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Approximately 30 percent of the budget and staff is allocated to this program element. While the percentage of their resources allotted to pollution control facilities appear adequate, actual budget and manpower resources are insufficient. The State Legislature has yet to fund an existing financial assistance law. If and when State financial assistance is available, more resources will be needed for this element.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Fund the State financial assistance law.
Encreased emphasis should be placed on waste characteristic data, process selection, and incorporation of advanced waste treatment technology into the State's program.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Major accomplishment was the continuation of an adequate review program.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.2 Municipal Construction Assistance

EVALUATION RATING: [illegible] MARGINAL [illegible]

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The State provides technical assistance to plants during maintenance and operation of facilities and meets with local officials to aid in planning and financing of needed facilities. The State program lacks a formal program for inspection of facilities during construction.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

The funding of an existing financial assistance law will be sought this year.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Statutes are adequate with the exception of a unfunded State financial assistance program and plant permit system. Staff, budget, and organization are not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Increase staff in order to inspect facilities during construction. Fund financial assistance program at a level necessary to receive maximum Federal grants. Program should be expanded to meet the new construction grant eligibility requirements.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

None indicated other than advising and reviewing of plans and specifications.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.3 Industrial Waste Treatment Assistance

EVALUATION RATING: GOODXXXXXADEQUATE MARGINAL POOR

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

State services consist of assessing effects of waste discharges on streams and advice relative to treatment process needed to meet the Water Quality Standards. Major weakness is the lack of a formal program for inspection of facilities during construction.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

None listed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Organization and statutes are adequate, except for lack of a permit system. Implementation of the feedlot regulations and updating the industrial inventory will necessitate expansion in terms of manpower and budget.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Increase staff efforts, particularly to merit cost recovery requirements under the new construction grants eligibility regulations and in order to inspect facilities during construction. Update industrial waste inventory. State should encourage construction of industrial waste treatment facilities through adoption of a subsidy, tax deferment, or rapid tax write-off.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

None indicated in the Plan.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 4 WATER POLLUTION CONTROL FACILITIES

PLAN SECTION: 4.4 Pollution Control Priorities

EVALUATION RATING: ~~XGOODX~~ ADEQUATE ~~MARGINALXXXXPOORX~~

1. **SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:**

The State's priority system is unchanged. Priority is based on need, readiness to proceed, present status of treatment, financial condition, and population. This activity conforms generally to FWQA rules. The needs list reflects approximately $22 million in facilities. It would appear that the one year needs list also includes needs through the next 5 years.

2. **IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:**

None indicated

3. **GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:**

Adequate except for including points for planning effort (see Item 4).

4. **FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:**

Points should be given in the priority system for planning such as river basin, regional planning, etc., to conform to new construction grants planning requirements. Fund existing State construction assistance program.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

NONE

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 5 TRAINING

PLAN SECTION:

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

The State's program consists of a 30-hour course covering fundamentals of treatment plant operation. Last year, three such training courses were held at three locations in the State. The City of Omaha also has a CAMPS program for training of presently employed operators. No information is given as to the number of trainees attending these courses. There is no formal training program for staff personnel. The staff is encouraged to attend at least one training course per year with the agency paying the expenses.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Expand to four the number of 30-hour training courses to be offered this year. In addition, offer at least two courses dealing with advanced operating problems. The State is also working with the FWQA Regional Office in an effort to establish a CAMPS program for presently employed plant operators.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Staff and budget are inadequate to meet the proposed increases in the training program. In fact, one wonders how the last year's efforts were accomplished with the limited money and manpower budgeted. The FY 1971 program proposes only one-tenth of a man-year and $1,834 in the budget for training. This effort is not adequate.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

A minimum effort of one man-year and a budget of $20,000 is necessary to meet minimum training needs proposed for FY 1971. At least 2 man-years of effort are needed to develop an adequate training program utilizing CAMPS.

A mandatory certification program should be adopted.

All staff members should attend at least one training course per year.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Three courses held to train operators, but number of operators participating is unknown. The agency has not indicated if staff personnel attended any training courses.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 6 POLLUTION CONTROL STUDIES AND PLANNING

PLAN SECTION:

EVALUATION RATING: [illegible] MARGINAL [illegible]

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

In the past the Agency had no program for systematic studies of river basins in the State; surveys and studies were conducted as problems arose. Some improvement should be noted in the future as the agency provides an input into the State Water Plan consisting of water pollution and water quality in a basin-by-basin approach. Present size of the staff limits them to "trouble shooting". A serious problem is noted in the reduction of effort in this element for FY 1972 when efforts should be expanded to meet planning requirements for construction grants.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

Expansion proposed by the Agency include: determining status of water quality and aquatic life in the Missouri River; updating industrial waste survey; continuing to provide input into State Water Plan.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

There is little change in the Agency's staff and budget. Approximately 15 percent of the budget is allotted to this element. Organization and staffing are insufficient, at least 4 man-years of effort are needed to handle the projects identified in the Plan and new planning requirements for construction grants.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

Increase in staff and budget is necessary to meet new basin planning requirements for construction grants. The Agency should take an active role in the preparation of the State Comprehensive Plan. Until adequate staff is developed, State should consider consultant contracts to conduct necessary planning and research. Through the State Water Plan, a program of routinely studying the State on a basin basis should be developed to ascertain water quality problems and develop a program for correction.

Statutes and regulations should be developed requiring Agency review and input into all environmental studies being conducted by other State agencies.

5. ADDITIONAL COMMENTS:

The Omaha-Council Bluffs Metropolitan Area Planning Agency is completing the first year of a 3-year water quality management project under an FWQA 3(c) basin planning grant.

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

No specific projects reported to be complete.

ANALYSIS OF PROGRAM ELEMENTS

PLAN ELEMENT: 7 PUBLIC INFORMATION

PLAN SECTION:

EVALUATION RATING: ~~GOOD~~ ~~ADEQUATE~~ MARGINAL ~~POOR~~

1. SUMMARIZE THE ACTIVITY OR FUNCTION AND COMMENT ON ITS ADEQUACY AS IT RELATES TO THE STATE'S TOTAL WATER POLLUTION CONTROL EFFORT:

This activity remains unchanged from last year. There is no formal public information program. Much of the work is done after normal working hours and cannnot be reflected in the budget or plan. The agency supplies speakers and releases information on water pollution to news media for dissemination to the public.

2. IMPROVEMENTS OR EXPANSION PROPOSED BY THE AGENCY:

No improvement or expansion proposed.

3. GENERAL ADEQUACY OF THE AGENCY'S STAFF, BUDGET, ORGANIZATION AND STATUTES AS THEY RELATE TO SECTION BEING REVIEWED:

Three percent of the budget and two-tenths of a man-year are allotted to public information. Organization, budget, and manpower are less than adequate. We question how $5,500 can be spent on public information by utilizing only two-tenths of a man-year, particularly when most informational material is supplied by FWQA.

4. FWQA RECOMMENDATIONS WHICH ARE MOST URGENT FOR IMPROVING THE STATE PROGRAM:

A positive program of preparation and decimation of information to the public, noting problems, and accomplishments would seem essential for an adequate program. A minimum of half a man-year should be allotted to this element.

5. ADDITIONAL COMMENTS:

NONE

6. SUMMARIZE KNOWN ACCOMPLISHMENTS DURING THE PREVIOUS FISCAL YEAR:

Agency provides speakers for numerous programs and meetings.